

LATHAM & WATKINS LLP  
Christopher S. Yates (Cal. Bar No. 161273)  
*chris.yates@lw.com*  
Belinda S Lee (Cal. Bar No. 199635)  
*belinda.lee@lw.com*  
Aaron T. Chiu (Cal. Bar No. 287788)  
*aaron.chiu@lw.com*  
505 Montgomery Street, Suite 2000  
San Francisco, California 94111-6538  
Telephone: +1.415.391.0600  
Fax: +1.415.395.8095

LATHAM & WATKINS LLP  
Sean M. Berkowitz (*pro hac vice* forthcoming)  
*sean.berkowitz@lw.com*  
330 North Wabash Avenue, Suite 2800  
Chicago, Illinois 60611  
Telephone: +1.312.876.7700  
Fax: +1.312.993.9767

*Attorneys for Defendants Broadcom Inc., Broadcom Corporation and Avago Technologies International Sales Pte. Limited*

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

SAMSUNG ELECTRONICS CO., LTD.

Plaintiffs,

v.

BROADCOM INC., BROADCOM CORPORATION, AND AVAGO TECHNOLOGIES INTERNATIONAL SALES PTE. LIMITED,

Defendant.

CASE NO. 3:24-cv-03959-LB

**DECLARATION IN SUPPORT OF  
STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME  
FOR PLAINTIFF TO RESPOND TO  
ANY MOTION FILED BY  
DEFENDANTS IN RESPONSE TO  
THE COMPLAINT AND  
DEFENDANTS' REPLY PURSUANT  
TO CIVIL LOCAL RULE 6-1(B) AND  
6-2**

1 I, Aaron T. Chiu, hereby declare as follows:

2 1. I am an attorney admitted to practice law in the state of California and a partner at  
3 Latham & Watkins LLP, counsel of record for defendants Broadcom Inc., Broadcom Corporation,  
4 and Avago Technologies International Sales Pte. Limited (collectively, "Defendants") in the  
5 above-captioned action.

6 2. I submit this declaration in support of the Parties' Stipulation and [Proposed] Order  
7 for Extension of Time for Plaintiff to Respond to Any Motion Filed by Defendants in Response to  
8 the Complaint and Defendants' Reply Pursuant to Civil Local Rules 6-1(b) and 6-2. I make this  
9 declaration based on my personal knowledge.

10 3. On July 1, 2024, Plaintiff filed the Complaint (ECF No. 1).

11 4. Plaintiff purported to have served the Summons and Complaint on Defendants on  
12 July 3, 2024 (ECF Nos. 7-9).

13 5. Defendants' deadline to answer or otherwise respond to the Complaint is July 24,  
14 2024.


15 6. The Parties have stipulated to extend Defendants' deadline to respond to the  
16 Complaint to August 28, 2024 (ECF No. 18).

17 7. Counsel for the Parties have met and conferred regarding an adjusted briefing  
18 schedule for any responsive motion that Defendants may file in response to the Complaint given  
19 counsels' existing conflicts and schedules, and agreed to extend (i) the deadline for Plaintiffs to  
20 oppose any motion that Defendants may file in response to the Complaint by 30 days to October  
21 11, 2024, and (ii) the deadline for Defendants' reply by 14 days to November 1, 2024.

22 8. The Parties do not intend for this extension of time to impact any other deadlines  
23 already fixed by Court order.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed July 23, 2024, in San Francisco, California.

26 By:   
27 Aaron T. Chiu  
28